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DISTRICT OF NEVADA	
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10 *Attorneys for the United States*

11 **UNITED STATES DISTRICT COURT**  
 12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,

14 Case No. 2:20-mj-695-BNW

15 Plaintiff,

16 **Stipulation for an Order**  
 17 **Directing Probation to Prepare**  
 18 **a Criminal History Report**

19 v.

20 JUAN ZUBIAS-GAMEZ,  
 21 a.k.a. "Juan Zabias-Gamez,"

22 Defendant.

23 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
 24 Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States  
 1 Attorney, counsel for the United States of America, and \_\_\_\_\_, Assistant  
 2 Federal Public Defender, counsel for Defendant JUAN ZUBIAS-GAMEZ, that the Court  
 3 direct the U.S. Probation Office to prepare a report detailing the defendant's criminal  
 4 history.

5 This stipulation is entered into for the following reasons:

6 1. The United States Attorney's Office has developed an early disposition  
 7 program for immigration cases, authorized by the Attorney General pursuant to the  
 8 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has  
 9

extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 13 day of August, 2020.

Respectfully submitted,

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Brian Pugh

/s/ Kimberly M. Frayn

KIMBERLY M. FRAYN

## Assistant United States Attorney

Assistant Federal Public Defender  
Counsel for Defendant  
**JUAN ZUBIAS-GAMEZ**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:20- mj-695-BNW

Plaintiff,

**[Proposed] Order Directing Probation to Prepare a Criminal History Report**

V.

JUAN ZUBIAS-GAMEZ,  
a.k.a. "Juan Zabias-Gamez,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 13 day of August, 2020.

st, 2020.

HONORABLE BRENDA N. WEKSLER  
UNITED STATES MAGISTRATE JUDGE